

WC Docket 14-93, Connect America Fund Phase II Challenge

- One Eleven Internet Services, Inc. in Illinois:

Per the National Broadband Map data, One Eleven Internet Services, Inc. claims to offer voice service in 981 Census Blocks in Illinois Consolidated Telephone Company Serving Areas. The Holding Company for One Eleven Internet Services, Inc. is Moultrie MultiCorp, Inc. which is the holding company for Moultrie Independent Telephone Company (a subsidized wireline ILEC). On its website page for Wireless Internet (included in One Eleven attachment), One Eleven cautions...."Requires a site survey to make sure you can get the wireless signal. The fee for the survey is \$25. If you qualify for the wireless service, we will waive the \$25.00 fee". This indicates that One Eleven cannot guarantee that it can unilaterally serve every customer in a given CB. In addition, for those that it can't provide service to, it proposes charging a \$25 survey fee to inform them of their inability to unilaterally provide service in that area! There is absolutely no indication on the website that digital phone service is included in its pricing options. If there is indeed such a service offered (no real way of knowing this based on the website), then number portability should be a viable customer option to keep their current telephone number. Given this option, ICTC should expect some level of porting activity in the CBs and should see port outs to this company in its internal porting data. Based on the Company Porting data from 2012 through 2014 (y-t-d), ICTC has yet to see any porting activity to One Eleven (or Moultrie). ICTC has solicited GeoResults to try to obtain wireline, fixed wireless, and mobile wireless portability status for customer telephone numbers inside the CBs in question. An attachment describing the GeoResults effort is included in this filing. Based on the GeoResults data, a multitude of the CBs that One Eleven claims to offer voice service to have little (from 0% to 10% for residential and business locations found) porting activity and based on company porting data, there is no evidence that any of that activity is related to One Eleven customers. Additionally, according to the FCC website list of Form 477 filers (see One Eleven attachment), One Eleven is listed as a Non-ILEC that provides only broadband service. The section for Part II VoIP service is unchecked. There is also no information in the website related to coverage areas for One Eleven in Illinois, so other than being in the Moultrie footprint, how is a customer to even surmise that they are eligible for the One Eleven service in a given area. Also, ICTC also questions the affiliate of a subsidized ILEC as being eligible to purport itself as being unsubsidized in a competitor area.

Finally, In order for One Eleven to provide the service, it must build facilities to Access Points in the ICTC footprint. To this date, ICTC has yet to receive any orders for any circuits to these "potential" access points, furthering the notion that One Eleven has yet to build any facilities in ICTC's footprint.

Based on the evidence referred to above, Illinois Consolidated Telephone challenges the competitive presence of One Eleven Internet Services, Inc. in the CBs listed on the form 505.

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CALL TODAY 1-888-502-4636

Reliability questionable
- No mention of Voice Service

FCC Form 477 Filers, State Level, as of June 30, 2013 (as submitted in filings made or revised as of May 29, 2014)

State	Affiliate Name *	FRN	Filing Company Name	ILEC or Non-ILEC	Broadband Part I	Local Exchange Telephone or Interconnected VoIP		Mobile Local Telephone
						Part II	Part III	Part III
Illinois	Moultrie MultiCorp, Inc.	0002816411	Moultrie Independent Telephone Company	ILEC	X	X	-	-
Illinois	Moultrie MultiCorp, Inc.	0013562020	One-Eleven Internet Services, Inc.	Non-ILEC	X	-	-	-

* Affiliate Name is used to include all entities under common ownership or control. Lists compiled for earlier Form 477 filings used the term Filing Holding Company Name or Common-Control Name.